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7 **UNITED STATES BANKRUPTCY COURT**
7 **EASTERN DISTRICT OF WASHINGTON**

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9 In re:

10 GIGA WATT, Inc., a Washington
10 corporation,

11 Debtor.

Case No. 18-03197 FPC 11

Chapter 11

12 **NOTICE OF CHAPTER 11**
12 **TRUSTEE'S MOTION FOR ORDER**
12 **APPROVING MOSES LAKE TWO-**
12 **WAY AGREEMENT**

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14 **PLEASE TAKE NOTICE** that Mark D. Waldron, in his official capacity
15 as the Chapter 11 Trustee (the “Trustee”), has moved (the “Motion”) the Court
16 pursuant to 11 U.S.C. §§ 363 and 364 and Fed. R Bankr. Proc. 4001 for an Order
17 approving the *Agreement to Settle Relief from Stay Motion, Obtain Super Priority*
18 *Unsecured Credit and Re-Enter the Premises* (the “Moses Lake Two-Way
19 Agreement”).

20 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Motion, the
21 Trustee requests the Court’s approval of the Moses Lake Two-Way Agreement
22 pursuant to which the Trustee is re-opening a portion of the Debtor’s operations,

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24 Notice of Chapter 11 Trustee’s Motion
24 for Order Approving Agreement, etc. - Page 1

25

1 borrowing the sum of \$169,500.19 at 19.9% interest on an unsecured super-
2 priority basis, and entering into a revenue-sharing agreement with the Moses Lake
3 Landlords until administrative liabilities to the Moses Lake Landlords are current.

4 **PLEASE TAKE FURTHER NOTICE** that the Motion and its supporting
5 papers and exhibits may be obtained from the Clerk of the above-captioned Court.

6 **PLEASE TAKE FURTHER NOTICE** that if you oppose the Motion,
7 then **within twenty-four day (24) days from the date of service by mail of this**
8 **Notice set forth below**, you must file your written response with the Court Clerk,
9 U.S. Bankruptcy Court, E.D. WA, 904 West Riverside Ave., Suite 304, Spokane,
10 WA 99201 or, if by mail, the Court Clerk, U.S. Bankruptcy Court, E.D. WA, P.O.
11 Box 2164, Spokane, WA 99210-2164 **and** serve a copy upon (1) undersigned
12 counsel at CKR Law LLP, 506 Second Ave., 14th Floor, Seattle, WA 98114 and
13 (2) James Perkins, Office of The United States Trustee, 920 West Riverside
14 Avenue, Suite 593, Spokane, WA 99201-1012.

15 **PLEASE TAKE FURTHER NOTICE** that the Court may enter an order
16 without actual hearing or further notice unless a written objection is timely served
17 and filed. If an objection is timely served and filed, you will receive notice of the
18 date and time of a hearing on your objection.

19 **DATE OF SERVICE BY MAIL: APRIL 8, 2019**

20 Dated: April 5, 2019 CKR LAW LLP

21 By: /s/ Paul H. Beattie
22 Paul H. Beattie (WSBA No. 30277)

23 *Attorneys for Mark D. Waldron, Chapter 11
Trustee*

24 Notice of Chapter 11 Trustee's Motion
25 for Order Approving Agreement, etc. - Page 2